



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

000002

EPA Region 5 Records Ctr.



235066

REPLY TO THE ATTENTION OF:

HSE-5J

DATE: MAR 24 1995

SUBJECT: ACTION MEMORANDUM - \$2 Million Exemption Request for an  
Emergency Removal Action at the Harrison Sheet Steel  
Site, Chicago, Cook County, Illinois  
(Site ID# OP)

FROM: Peter Guria, On-Scene Coordinator *Donald J. Bruce*  
*for* Emergency and Enforcement Response Branch - Section 2

THRU: William E. Muno, Director  
Waste Management Division *WEM*

TO: Valdas V. Adamkus  
Regional Administrator

I. PURPOSE

The purpose of this Memorandum is to obtain your approval for a \$2 Million Exemption Request to expend up to \$ 2,407,715 to mitigate threats to human health and the environment posed by the presence of uncontrolled hazardous substances (lead, chromium, and flammable liquids and solids) located at the Harrison Sheet Steel Company site (HSS), 4718 West 5th Avenue, Chicago, Cook County, Illinois 60644. The proposed action is being taken pursuant to Section 104 (a)(1) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, by removing drums and small containers of solid material containing lead, cyanide, flammable, and other unknown materials. Verbal Authority to expend up to \$50,000 was granted on February 21, 1995, by the Chief of the Emergency and Enforcement Response Branch (EERB), to initiate site stabilization and security measures. It is estimated that the removal action will require 180 on-site working days to complete. The proposed removal action is an emergency due to conditions at the site.

The site is not on the National Priorities List (NPL).

## **II. SITE CONDITIONS AND BACKGROUND**

**CERCLIS ID# IL 0001048834**

### **A. Physical Location**

The HSS site is located at 4718 West 5th Avenue, Chicago, Cook County, Illinois. The site is situated in a light industrial/residential area with 5th Avenue defining the site's southern boundary and consists of a series of interconnected rectangular cinder block, brick, and steel buildings (Attachment 3, photograph #1). The facility is bordered immediately to the west by a residential home and city alleyway, and to the north by a narrow alleyway which separates the site from the back of residential homes located along Arthington Street (Attachment 3, photographs #3, and #16-18). A rail yard is located approximately 500 feet south of 5th Avenue. Sumner Elementary school is located approximately 3 blocks to the east. The surrounding neighborhood is comprised of low income housing and vandalism is commonplace. The population within one square city block is approximately 200. During the past year this area of the City of Chicago was designated as an empowerment zone and is known as the Roosevelt/Kostner Redevelopment Corridor.

### **B. Site Description and Background**

The HSS site is currently in a severe state of deterioration due to numerous fires which have occurred at the facility. Since March 1993, the Chicago Fire Department has responded to 7 fires at the site. The most recent fire occurred in January 1995, and caught the attention of the U.S. EPA On-Scene Coordinator (OSC), who was conducting a time critical removal action at the David Chemical site nearby. According to local residents, the Harrison Steel Desk and File Company began operation in the 1950's, and manufactured metal desks and file cabinets until its closure in 1983. No additional background information on the site is available from either the Illinois Environmental Protection Agency (IEPA) or the City of Chicago, Department of the Environment (CDOE). During site investigations conducted between February 14 and 17, the U.S. EPA OSC observed deteriorated equipment and machinery used in the electroplating and painting processes.

On February 17, 1995, the U.S. EPA Emergency and Enforcement Response Branch (EERB) conducted a site assessment of the HSS site to evaluate threats posed to human health and the environment. The U.S. EPA OSC and Technical Assistance Team (TAT) conducted air monitoring and collected solid and liquid samples from drums and the floor of the facility. Approximately 1,000 55-gallon drums were observed throughout the site in various stages of deterioration. Many of the drums were severely deteriorated and had released their contents (Attachment 3, photographs #4, #5, and #7-12). Labels present on a majority of

the drums were illegible or removed. One of the drums was labeled "CYANEC", and indicated the presence of 96 % sodium cyanide (Attachment 3, photograph #13). An unknown number of 5-gallon containers were also found throughout the facility in various states of deterioration. Many of these containers were labeled flammable and appeared to contain paint material.

The facility consists of a number of buildings. Portions of the facility contained bi-level electroplating operations. The roofs and second floor structures of two of the buildings in the electroplating areas have completely collapsed as a result of fire damage (Attachment 3, photograph #6). The OSC and TAT observed a former storage area of flammable materials that was also gutted by fire (Attachment 3, photographs 7 and 8).

Air monitoring conducted inside the facility for explosive vapors, hydrogen cyanide, and radioactivity did not indicate any levels above background on any of the instruments; however, the OSC noted that during a previous inspection paint-like volatile organic chemicals were detected near a small inaccessible room. A total of seven samples were collected from drums, an electroplating tank, and from the floor of the facility and analyzed for total and Toxicity Characteristic Leachate Procedure (TCLP) volatile and semivolatile organic compounds, Resource Conservation and Recovery Act (RCRA) metals, and total and reactive cyanide and sulfide. Analytical results of solid and liquid samples collected from 4 drums, an electroplating tank, and the floor of the facility revealed the presence of elevated levels of total chromium (ranging from 8,600 parts per million (ppm) to 482 ppm); total lead (ranging between 31,600 ppm and 4,150 ppm); TCLP VOCs (methyl ethyl ketone at 2.1 milligrams per liter (mg/l)); and, flammable liquids with a flashpoint of 140°F.

### C. Current Site Conditions

Between February 23 and March 2, 1995, the Emergency Response Cleanup Services (ERCS) contractor, Riedel Environmental Services, under direction of the U.S. EPA OSC, subcontracted a board-up service and a fence company to secure the site. Access is now somewhat restricted by chain link fencing and locked gates; however, as witnessed by the OSC and Chicago Police Department (CPD), trespassing and vandalism occur quite frequently in the neighborhood. Approximately 1,000 drums and hundreds of 5-gallon paint containers have been observed within the facility, many in a severe state of deterioration, open and releasing their contents. Samples collected from drums, an electroplating tank, and the floor of the facility were found to contain elevated levels of lead, chromium, flammable liquids, and unknown liquids and solids. Numerous 5-gallon containers containing flammable materials have also been observed. The buildings are in a severe state of deterioration as a result of

fire damage from vandalism and other unknown causes. In two sections of the facility the roof and second floor have collapsed to the ground damaging drums and releasing their contents. On several occasions the U.S. EPA OSC has observed vandals entering the facility to remove scrap metal (Attachment 3, photograph #15).

Toxicity Characteristic Leachate Procedure (TCLP) analysis of solid samples collected by the U.S. EPA from drums and the floor of the facility revealed high levels of lead ranging from 5.0 to 84.5 ppm. Additional samples collected from drums and floor material were found to contain total chromium levels ranging from 8,600 to 482 ppm. One drum was found to contain a flammable liquid with a flashpoint of 140°F. The analytical results of the liquid and solid material indicate the presence of characteristic ignitable and toxicity characteristic wastes under the Resource Conservation and Recovery Act (RCRA) of 1976, as amended, and 40 CFR 261.21, and 40 CFR 261.24.

#### **D. Other actions to date.**

The City of Chicago Police and Fire Departments have been conducting daily surveillance of the HSS site to ensure that the site has remained secure.

The proposed cleanup activities in this Action Memorandum have been discussed in detail with Lafayette Robertson of the City of Chicago Department of Environment (CDOE), and Ed Orsowski of the Illinois Environmental Protection Agency (IEPA).

### **III. THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**

Conditions at the HSS site present a release, and potential threat of release, of a CERCLA hazardous substance, threatening to public health, or welfare, or the environment based upon factors set forth in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR 300.415 (b)(2).

These factors include:

- a) actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants;

This factor is present at the facility due to the presence of solids containing lead and chromium found in drums and small containers. Label information on one of the drums found on site also indicates the presence of 96% sodium cyanide. Drums and 5-gallon containers of flammable liquids and solids were also observed. Analytical results of samples collected from drums, small containers, and the floor of the facility have revealed

TCLP lead levels ranging from 5.0 to 84.5 ppm and total chromium levels ranging from 482 to 8,600 ppm. The TCLP regulatory limit for lead is 5.0 ppm. Elevated levels of volatile organic compounds such as methyl ethyl ketone (2.1 mg/l-TCLP) are also present.

The high concentrations of the above materials exhibit the characteristic of toxicity of hazardous wastes under RCRA, and 40 CFR 261.24, and are hazardous substances under section 101(14) of CERCLA.

Lead and chromium are human carcinogen's that can be absorbed through direct contact and ingestion routes of exposure, resulting in stomach, kidney, and central nervous system ailments. Volatile organic materials pose inhalation, ingestion, and direct contact hazards which can result in irritation to the respiratory tract, eyes, and skin. The site is bordered by residential homes immediately to the north and west, and people have been observed in the building removing materials with scrap value (Attachment 3, photographs #15 & #16). Additionally, there was evidence that one room of the site was used as a shelter for a homeless individual. The toxic nature of solid material containing lead and chromium present direct contact and ingestion threats to public health should unauthorized access continue.

- b) hazardous substances or pollutants or contaminants in drums barrels, tanks, or other bulk storage containers that may pose a threat of release;

This factor is present at the facility due to the existence of drums and small containers of toxic and flammable liquids and solids. Over 1,000 drums and hundreds of 5-gallon containers have been identified throughout the facility, many open and have released their contents (Attachment 3, photographs #9-12). Drums have been observed in a severe state of deterioration throughout the buildings. Label information on many of the 5-gallon containers indicate flammable liquids and/or solid material. Analytical results of samples collected from the drums have revealed elevated and toxic levels of lead and chromium ranging from 5.0 to 84.5 ppm and 482 to 8,600 ppm, respectively.

One of the buildings contained a bi-level electroplating operation, and as a result of a fire, the entire roof and second floor structure collapsed. Roof debris is intertangled with much of the electroplating line superstructure (Attachment 3, photographs #4-6). Numerous drums are located beneath the debris. Large chunks of paint solids are scattered throughout this area, indicating that the drums may have released their contents as a result of a fire, when the building structure collapsed, or where the drum carcass corroded away after exposure to the natural elements. The present state of the remaining

building structure increases the potential for a release of material from the drums if allowed to deteriorate.

- c) weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

This factor is present at the facility due to the continued vandalism and deterioration of the building structure (Attachment 3, photograph #6).

Open and leaking drums containing elevated levels of inorganic solids and flammable materials have been documented on site. If the buildings are allowed to remain in their present condition, continued exposure of the drums and containers to the natural elements could accelerate deterioration and release their contents. Continued deterioration of the building structure could result in a release of drum contents from falling debris. Additionally, many of the drums are of unknown contents. Deterioration of the drums and containers could result in mixing and migration of incompatible materials.

- d) threat of fire and explosion;

This factor is present at the facility due to the presence of drums and small containers of flammable liquids. The CFD has responded to 7 fires at the site over the last two years. One fire consumed a small storage room which contained flammable materials (Attachment 3, photographs #7-8). Analytical results of a sample collected from one drum revealed a liquid with a flashpoint of 140°F, exhibiting the characteristic of ignitability under RCRA, and 40 CFR 261.21. Hundreds of 5-gallon containers labelled flammable have also been observed at the site, some involved in previous fires (Attachment 3, photographs #7-8). Additionally, an inaccessible room with signs indicating flammable storage may contain substances which could create the potential for fire and/or explosion. The site is abandoned and trespass and vandalism are common. Should unauthorized access to the building continue, the potential for arson remains high.

- e) the unavailability of other appropriate Federal or State response mechanisms to respond to the release;

This factor supports the actions proposed by this Memorandum at the facility because neither the IEPA nor the City of Chicago have the necessary resources, or clean up contractor mechanisms in place, to respond to this time-critical situation.

#### **IV. ENDANGERMENT DETERMINATION**

The current site conditions, the presence of drums and containers of toxic, volatile organic compounds, heavy metals, and flammable liquids pose serious threats to human health and the environment

through direct contact, ingestion, inhalation, or fire and explosion should a release occur. Chromium and lead exhibit the characteristic of toxicity under 40 CFR 261.24 (D007, D008), flammable liquids found at the site exhibit the characteristic of ignitability under 40 CFR 261.21, and all are hazardous substances under section 101(14) of CERCLA. Access is somewhat restricted by boarded and fenced windows and doorways. The roof and several of the buildings are in a severe state of deterioration as a result of fire damage.

Should the building structure continue to deteriorate, falling debris could compromise the integrity of the drums and containers and cause a release of material which may migrate outside the facility.

The actual or threatened releases of these hazardous substances, if not addressed by implementing the response action proposed in this Action Memorandum, may present a threat of exposure to heavy metals, volatile organic compounds, and flammable liquids, and a potential threat of release to public health, or welfare, or the environment.

#### **V. EXEMPTION FROM STATUTORY LIMITS**

The conditions at the HSS site meet the requirements for a \$2 Million Emergency Exemption and are immediately required to prevent, limit, or mitigate the emergency as stipulated in the CERCLA section 104(c) exemption.

##### **A. The Emergency Exemption**

1) There is an immediate risk to public health or welfare or the environment.

An estimated 1,000 55-gallon drums and small containers have been documented throughout the site. Many of these drums and containers are severely deteriorated and have released their contents. Samples collected from 4-drums and solid material present on the floor from several locations of the facility have revealed elevated levels of TCLP lead and elevated levels of chromium. Analytical results of these samples have revealed TCLP levels of lead ranging from 5.0 to 84.5 ppm and levels of total chromium from 482 to 8,600 ppm. The RCRA regulatory limit for TCLP lead is 5.0 ppm, and the removal action limit for total chromium is 500 ppm.

Buildings on-site are severely damaged by fire. In several areas building debris has fallen and damaged drums causing a release of their contents. The CFD has responded to seven fires at the site since March 1993. Two small areas within the buildings were designated for flammable material storage and have been impacted by these previous fires (Attachment 3, photographs #7 & #8).

Additional fires in these areas of the buildings could allow the subsequent spread of toxic vapors to the residential homes located within 150' north and west of the site. The site is not secure. On several occasions the OSC has observed people in the buildings removing material with scrap value. The levels of lead and chromium documented on-site present potential health threats through ingestion and inhalation. Should unauthorized access to the site continue, the potential for exposure to these hazardous substances remains high.

**2) Continued response actions are immediately required to prevent, limit, or mitigate the emergency.**

The CFD has responded to 7 fires at the site since March 1993. The most recent fire occurred in January 1995, and was brought to the attention of the U.S. EPA. A site assessment conducted on February 17, 1995, documented the presence of approximately 1,000 drums and hundreds of 5-gallon containers. Many of the drums are severely deteriorated, and many are open and have released their contents. The structural integrity of the buildings has been compromised as a result of fire damage (Attachment 3, photographs #4-6). In several areas of the site building debris has fallen onto drums and caused a release of their contents. Samples collected from drums and floor solids have revealed the presence of elevated levels of TCLP lead ranging from 5.0 to 84.5 ppm, and total chromium ranging from 482 to 8,600 ppm. If the buildings continue to deteriorate the potential for additional drums to be damaged and release their contents remains.

The site is abandoned and trespass and vandalism are common. On several occasions vandals have been observed within the facility removing materials with scrap value (Attachment 3, photograph #15). Should unauthorized access to the building continue, the potential for arson remains high.

**3) Assistance will not otherwise be provided on a timely basis.**

Neither the State of Illinois nor the City of Chicago have the resources to provide the funds or personnel to conduct removal activities at the site. The City of Chicago, Department of the Environment, will assist the U.S. EPA in coordinating removal actions with local emergency and City officials.

#### **VI. PROPOSED ACTIONS AND ESTIMATED COSTS**

The purpose of this removal action is to mitigate the threats posed to public health, or welfare, or the environment by the presence of deteriorating and/or leaking drums, containers, and floor material of toxic, flammable, and other unknown liquids and solids. Removal activities at the site are to include: sampling

and characterization of all drums, small containers, and floor material; consolidation of all characterized hazardous substances and wastes; decontamination of emptied drums and building walls and floors; and, the disposal of all characterized wastes identified and generated during removal activities.

Specifically, the following activities are proposed:

- 1) Develop and implement site health, safety, and security measures;
- 2) Develop and implement an air monitoring and sampling program during removal activities;
- 3) Stage, sample, secure, and characterize all liquid and solid material found in drums, pits, floor sumps, and small containers;
- 4) Decontaminate or dispose of all scrap metal and RCRA-empty drums produced during removal activities;
- 5) Decontaminate affected building walls and floors and perform soil sampling to determine that elevated levels of hazardous substances and contaminants are below U.S. EPA Action Levels; and
- 6) Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants at a RCRA/CERCLA-approved disposal facility in accordance with the U.S. EPA Off-Site Rule 58 F.R. 49200, effective October 22, 1994.

Removal activities will require approximately 180 on-site working days to complete. The threat posed by the presence of drums and small containers of lead (TCLP range of 5.0-85 ppm), chromium (total range of 482 to 8,600 ppm), flammable liquids (f.p. 140° F), and cyanide meet the criteria listed in Section 300.415(b)(2) of the NCP and are consistent with any long-term remedial action which may be required.

The OSC has begun planning for the provision of post-removal site control, consistent with the provisions of Section 300.415(k) of the NCP. The nature of the removal, elimination of all air and surface threats, is, however, expected to eliminate the need for post-removal site control.

The detailed cleanup contractor costs are presented in Attachment 1 and estimated project costs are summarized below:

**EXTRAMURAL COSTS**

Cleanup Contractor	\$ 1,500,000
Contingency (15%)	<u>225,000</u>
Subtotal	1,725,000
Total TAT, including multiplier costs	<u>244,000</u>
Extramural Subtotal	\$ 1,969,000
Extramural Contingency (15%)	<u>295,350</u>
TOTAL, EXTRAMURAL COSTS:	\$ 2,264,350

**INTRAMURAL COSTS:**

U.S. EPA Direct Costs \$30/hr x (1525 Regional + 153 HQ hrs)	\$ 50,340
U.S. EPA Indirect Costs \$61/hr x (1525 Regional hrs)	<u>93,025</u>
TOTAL, INTRAMURAL COSTS	\$ 143,365
TOTAL REMOVAL PROJECT CEILING ESTIMATE	<u><u>\$ 2,407,715</u></u>

The response actions described in this Memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the facility which may pose direct contact, inhalation, migration, and fire and explosion threats to public health and safety and to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

**Applicable or Relevant and Appropriate Requirements (ARARS)**

All applicable, relevant, and appropriate requirements (ARARS) will be complied with to the extent practicable. Federal ARARS for this site include RCRA. As the materials being dealt with are likely to be RCRA characteristic wastes, they will be handled accordingly. To the degree materials are treated on-site, treatment will meet RCRA land disposal restrictions found in 40 CFR Part 268. To the degree materials are sent off site, RCRA manifesting requirements will be complied with.

The materials will be sent to an acceptable RCRA treatment, storage, and/or disposal facility pursuant to the U.S. EPA Off-Site Rule.

A letter has been sent to Mr. Ed Orsowski of the Illinois Environmental Protection Agency (IEPA) requesting that IEPA identify State ARARS. Any State ARARS identified in a timely manner for this removal action will be complied with to the extent practicable.

**VII. CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED**

Given the site conditions, the nature of the hazardous substances documented on site, and the potential exposure pathways to nearby populations described in sections II and III above, actual or threatened releases of hazardous substances from the HSS site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

**VIII. ENFORCEMENT**

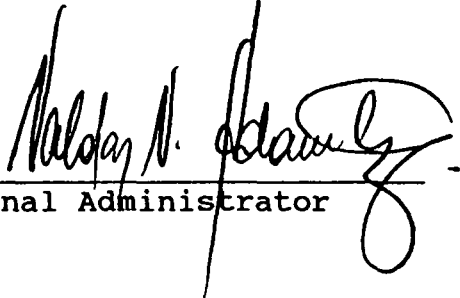
For administrative purposes, information concerning confidential enforcement strategy for this site is contained in the Confidential Enforcement Addendum.

**IX. RECOMMENDATION**

This decision document represents the selected removal action for the Harrison Sheet Steel site, located in Chicago, Cook County, Illinois, developed in accordance with CERCLA, as amended by SARA, and is not inconsistent with the NCP. This decision is based upon the Administrative Record for the site. Attachment 2 identifies the items that comprise the Administrative Record upon which the selection of the removal is based.

Because the conditions at the site meet the NCP Section 300.415(b)(2) criteria for an emergency removal action and the CERCLA section 104(c) emergency exemption from the \$2 million limitation, your approval of the proposed removal action and \$2 million exemption is recommended. The estimated total project costs are \$ 2,407,715 of which up to \$ 2,020,350 may be used for cleanup contractor costs. You may indicate your decision by signing below:

APPROVE:

  
Regional Administrator

DATE

3/24/95

DISAPPROVE:

\_\_\_\_\_  
Regional Administrator

DATE

\_\_\_\_\_

**Enforcement Addendum**

**Attachments**

1. Detailed Cleanup Contractor Cost
2. Administrative Record Index
3. Photographs

**cc:** T. Johnson, U.S. EPA, 5202-G  
Don Henne, U.S. Department of the Interior  
Custom House, Room 217  
200 Chestnut Street  
Philadelphia, PA 19106-2904  
T. Crause, Illinois Environmental Protection Agency  
Division of Land Pollution Control  
2200 Churchill Road  
Springfield, IL 62794-7921

**bcc:** A. Baumann, HSRL-5J  
R. Karl, HSE-5J  
J. Cisneros, HSE-5J  
D. Bruce, HSE-5J  
O. Warnsley, CRU, HSRLT-5J  
T. Lesser, P-19J  
D. Crume-Williams, MF-10J  
EERB Read File (M. Johnson)  
EERB Delivery Order File (M. Gustafson)  
EERB Site File (SF Central File Room)  
Contracting Officer, MC-10J  
P. Guria, HSE-5J  
L. Beasley, HSE-5J  
S. Prout, CM-29A

ENFORCEMENT ADDENDUM

Redacted - not relevant to the selection of the removal action.

**ATTACHMENT 1**

**DETAILED CLEANUP CONTRACTOR COST ESTIMATE  
HARRISON SHEET STEEL SITE  
CHICAGO, COOK COUNTY, ILLINOIS  
MARCH 1995**

ERCS Personnel	\$ 400,000
ERCS Equipment and Materials	165,000
ERCS Subcontractors	245,000
Sampling and Analytical	150,000
Transportation and Disposal	<u>540,000</u>
TOTAL	\$ 1,500,000

## ATTACHMENT 2

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REMOVAL ACTIONADMINISTRATIVE RECORD  
FOR  
HARRISON SHEET STEEL SITE  
CHICAGO, COOK COUNTY, ILLINOIS

March 16, 1995

<u>DATES</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
03/13/95	Ecology & Environ- ment, Inc.	Nabasny, G., U.S. EPA	Site Assessment Report	59
00/00/00	Guria, P., U.S. EPA	Adamkus, V., U.S. EPA	Action Memorandum (Pending)	

**ATTACHMENT 3  
HARRISON SHEET STEEL SITE  
PHOTOGRAPHS**



Photo #1

Direction: NW Date: 2/17/95 Photographer: Pete Guria  
 Description: View of Harrison Sheet Steel Bldg. looking down 5th St. Cabinet Manufacturer Bldg in foreground at the corner of 5th and Kilpatrick.



Photo #2

Direction: NW Date: 2/17/95 Photographer: Pete Guria  
 Description: Front of Harrison Sheet Steel Bldg. Note condition and fire damage. Yellow Structure to the left is a residential home.



**Photo #3**

Direction: South Date: 2/17/95 Photographer: Pete Guria

Description: View of west end of Bldg. Note condition and residential home to the right.



**Photo #4**

Direction: South Date: 2/17/95 Photographer: Pete Guria

Description: Interior of Bldg. where drums are located. Drums can be seen in the back at left as well as foreground.



Photo #5

Direction: SE Date: 2/17/95 Photographer: Pete Guria

Description: View of drums in large section of bldg, many of unknown contents.



Photo #6

Direction: NW Date: 2/17/95 Photographer: Pete Guria

Description: View from second floor. Note fire and structural damage. Drums are located below, as depicted in Photo's 4 & 5.



**Photo #7**

Direction: South Date: 2/17/85 Photographer: Pete Guria  
 Description: View at rear (North) end of facility. Flammable storage room w fire damage. All that remains is the door.



**Photo #8**

Direction: South Date: 2/17/85 Photographer: Pete Guria  
 Description: Close view of drums and pails remaining in flammable storage room after the fire.



Photo #9

Direction: South Date: 2/17/95 Photographer: Pete Guria  
Description: Drums of unknown contents located in western bldg.  
on the site.



Photo #10

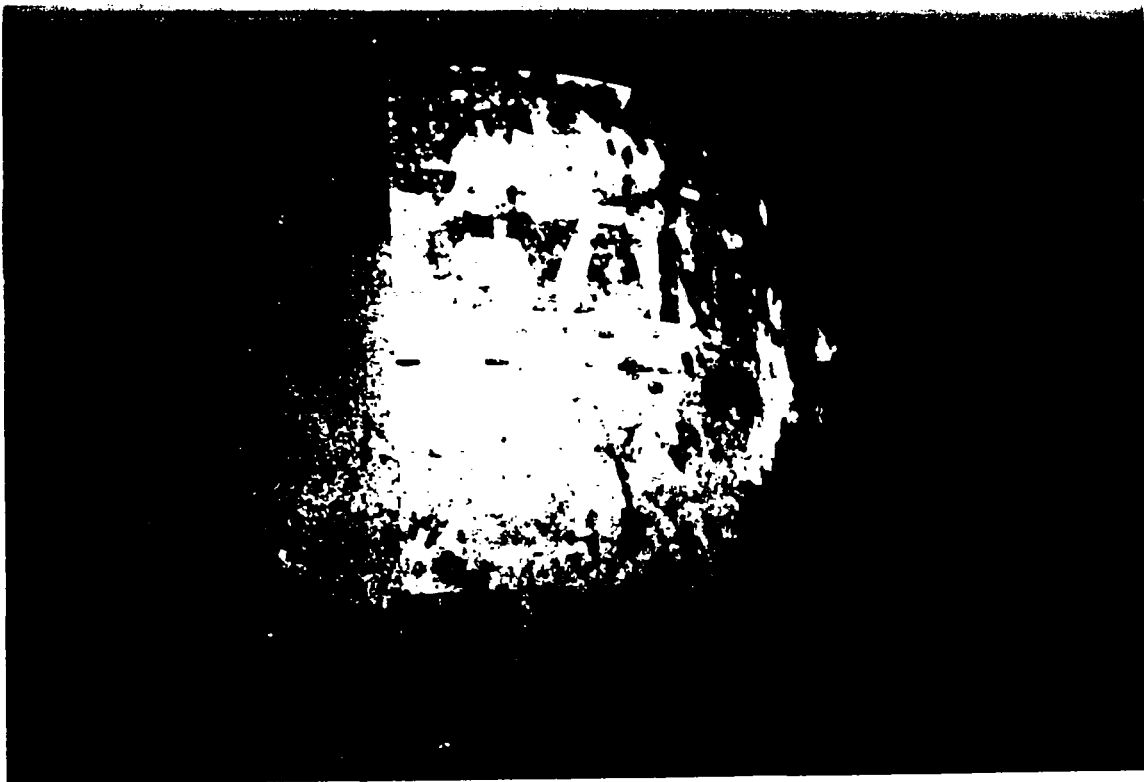
Direction: South Date: 2/17/95 Photographer: Pete Guria  
Description: Deteriorated drums and unknown material that has  
been released.



Photo #11  
 Direction: North Date: 2/17/95 Photographer: Pete Guria  
 Description: Drums scattered throughout western portion of bldg.



Photo #12  
 Direction: East Date: 2/17/95 Photographer: Pete Guria  
 Description: Deteriorated drum which has released its unknown contents.



**Photo #13**

Direction:      Date: 2/17/95    Photographer: Pete Guria

Description: Drum labeled Sodium Cyanide.



**Photo #14**

Direction: North      Date: 2/17/95    Photographer: Pete Guria

Description: Floor in one section of the bldg. where painting was suspected of taking place.



**Photo #15**  
**Direction:** South      **Date:** 2.17.95      **Photographer:** Pete Guria  
**Description:** Individual removing scrap material from a section of the bldg.



**Photo #16**  
**Direction:** NE      **Date:** 2.17.95      **Photographer:** Pete Guria  
**Description:** Residential homes located around the alley, immediately behind the Hamilton site.



Photo #17

Direction: North Date: 2/17/95 Photographer: Pete Guria

Description: Closer view of homes located immediately behind the HSS site.



Photo #18

Direction: NE Date: 2/17/95 Photographer: Pete Guria

Description: View of homes located immediately behind the Harrison Sheet Steel site.